



Public Testimony of the American Petroleum Institute

Proposed Standards of Performance for New, Reconstructed, and Modified Sources and Emissions Guidelines for Existing Sources: Oil and Natural Gas Sector Climate Review

November 30, 2021

Thank you for the opportunity to provide public comment today. My name is Kevin O’Scannlain. I am the Vice President of Upstream Policy at the American Petroleum Institute (API).

API represents all segments of America’s oil and natural gas industry. Our members produce, process, and distribute most of the nation’s energy. The industry supports more than 10 million U.S. jobs and nearly 8% of the U.S. economy. API was formed in 1919 as a standards-setting organization and has developed more than 700 standards to enhance operational and environmental safety, efficiency and sustainability.

API and its members recognize the importance of developing oil and natural gas resources responsibly and are committed to delivering solutions that reduce the risks of climate change while meeting society’s growing energy needs. We support the direct regulation of methane for new and existing sources and remain committed to working with EPA and the Administration to identify emission control opportunities that are cost-effective, facilitate innovation and further the progress made in reducing

emissions.

As API reviews the proposed rules, we want to acknowledge EPA's inclusion of an alternative fugitive emissions monitoring option that allows for use of advanced detection technologies. As API and other stakeholders have noted, the ability to take advantage of new, more efficient and effective technologies allows for monitoring programs that can more quickly identify and address larger emission events. We appreciate EPA's consideration of new monitoring frameworks and will provide in our comments suggestions to further improve the proposed framework to allow for and advance the use of methane detection technologies.

We also appreciate EPA's incorporation of the streamlined recordkeeping and reporting requirements and the in-house engineer certification option from the 2020 OOOOa technical amendments. We support the inclusion of provisions such as these which maintain environmental control standards and assure compliance with less administrative burden, and encourage EPA to consider other areas of the proposed rules where streamlining could be achieved.

The proposal includes substantial changes from current regulations and includes multiple areas where EPA is requesting comments. As we review and analyze the rules, we will be considering the cost-effectiveness, feasibility, and operability of the proposed control standards. EPA may not always be aware of technical, site and logistical limitations that may impact use of a specific equipment type or control, or application of a work practice. Our comments will identify any significant issues and suggest alternative solutions, as applicable.

With respect to rule implementation, we urge EPA to carefully consider the availability and cost of equipment, labor and other required resources needed to comply with the

proposed standards. These aspects are especially critical in setting workable implementation timelines, given the hundreds of thousands of existing sources that may require retrofit, and current well-documented supply chain shortages.

Lastly, we note the need for additional time to review and respond to the proposed rules. Considerable effort will be required to analyze and understand rule implications, and to develop constructive comments. Further, EPA has explicitly solicited feedback on over 200 specific items, all of which will require time to analyze, collect any necessary data, and develop thoughtful responses. A minimum 30-day extension to the comment period will be necessary to respond to the proposed rules.

Reducing VOC and methane emissions is a priority for our industry, and we look forward to continued collaboration with EPA as it further develops and finalizes these new rules. Thank you.